

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)

Telephone Number Portability)

CC Docket No. 95-116

REPLY COMMENTS OF NORTHERN TELECOM INC.

Northern Telecom Inc. ("Nortel") hereby responds to comments filed in this proceeding on number portability. Nortel strongly supports the Commission's initiative in exploring these issues. Nortel recommends that the Commission focus its efforts on developing a single long-term solution to the provision of service provider, service, and location portability.^{1/} Because of the complexity of the technical, operational, and standards issues raised by number portability, a sustained effort by the Commission and by industry will be necessary to achieve such a solution.

As one of the largest telecommunications equipment providers in the United States, Nortel is well qualified to address these issues. Nortel designs, develops and supplies equipment and complete networks and systems to the telecommunications industry, businesses, universities, local, state, and federal governments, and other institutions worldwide.

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1/ See Telephone Number Portability, Notice of Proposed Rulemaking, CC Docket No. 95-116, FCC 95-284 (rel. Jul. 13, 1995) (the "Notice"). Comments referred to herein are those filed on or about September 12, 1995 in this docket.

The company employs more than 22,000 people in the United States in manufacturing plants, research and development centers, and in marketing, sales, and services offices around the country.

From its perspective as a systems manufacturer, network supplier, and vendor, Nortel agrees with the widely-held view in the comments supporting a general long-term solution to number portability issues.^{2/} A single solution is necessary to minimize the costs of implementation, operation, and maintenance that could result from uncoordinated variations in number portability regimes.^{3/} As commenters in this proceeding indicate, developing a single portability solution will be a formidable task.^{4/} Implementing number portability affects the most fundamental aspects of communications networks, such as call processing, signalling, interconnection, and billing.^{5/} It is clear that successful implementation of portability in the long term will require substantial changes to switch platforms, as well as operator services, billing systems, and providers' Signalling System #7 infrastructures. Indeed, developing a solution that is interoperable among multiple equipment vendors will be a substantial challenge. As a result, concentrated work by the entire industry, as well as the Commission and the states,

^{2/} See, e.g., Comments of USTA at 2, Comments of MCI at 10-12, 20-22; Comments of US West at 12.

^{3/} Cf., Comments of Bell Atlantic at 9-10.

^{4/} See, e.g., Comments of PCS Primeco, L.P., at 1-2, Comments of GNVW Inc./Management at 8.

^{5/} See, e.g., Comments of BellSouth at 37-42.

will be necessary to realize the benefits of number portability while ensuring the integrity of the network.

The pursuit of a single solution by the Commission and the industry can go far toward addressing network integrity issues in a coherent and efficient manner. Once these issues are resolved, the availability of such a solution on network switching platforms and related systems will depend on the types and magnitude of requirements of system operators.

In supporting a Commission focus on a single portability solution, Nortel recognizes the value of the numerous number portability trials and proposed interim solutions discussed in the Notice and by commenters.^{6/} Nortel has participated in several of these activities, such as the efforts of the Illinois Commerce Commission Number Portability Task Force and the number portability trial led by the New York Public Service Commission, helping to develop and manufacture systems solutions to provide local number portability in these trials. In developing a single portability solution, the industry, the Commission, and the states should make full use of the experiences gained from these activities. By doing so, one or more transition paths may be developed for deployment as we advance to a single long-term solution.

Nortel supports the formation of an active industry forum to work through the technical, operational, and implementation aspects of a long-term numbering portability

^{6/} See, e.g., Notice at paras. 5, 14-17, Comments of Seattle Local Number Portability Trial.

solution, including the design of appropriate transition paths prior to deployment of such a solution. While the Commission should continue its strong policy leadership on these issues, the industry should develop the details of the solution. Nortel would be happy to participate in such a forum.

Number portability is of great importance to the future of the U.S. telecommunications infrastructure and the economic and social benefits that the infrastructure can support. Accordingly, number portability should develop as part of a unified and durable national policy. WHEREFORE, Nortel respectfully requests the Commission to adopt the views expressed in these reply comments.

Respectfully Submitted,



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Dated: October 12, 1995

CERTIFICATE OF SERVICE

I, Katherine H. Rasdorf, hereby certify that on the 12th day of October 1995,
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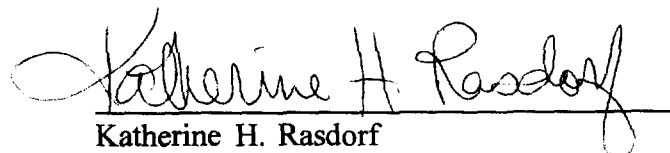
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